Forest Practices Operations

4.1 Introduction

This chapter provides information on two elements of the forest practices program that are specific to forest practices operations. The first element is forest practices guidance. DNR develops internal guidance that provides direction for implementing the Forest Practices Act and rules. The second element is the forest practices program region audits. In 2006, the forest practices program began an internal audit process with the purpose of evaluating delivery of the forest practices program within each of the regional offices. Included in this chapter are the draft work plan for the audit and the results from the two completed regions (Northwest and Olympic).

4.2 Forest Practices Guidance

Internal guidance developed by DNR supplements the forest practices rules and Board Manual. The complexity of the rules, details of program administration and variability in the forested environment often pose unique challenges for landowners and DNR staff implementing the regulations across the landscape. Situations commonly arise where neither the rules nor the Board Manual provide enough specificity to address a particular implementation issue. In these cases, it is necessary for DNR to develop internal guidance that provides direction consistent with established program goals, resource objectives and performance targets. Internal guidance is developed within DNR's Forest Practices Division. Once complete, new guidance or changes to existing guidance are communicated to region forest practices staff. Guidance that affects cooperating agencies, organizations and landowners is then shared outside of the agency.

Guidance Provided June 5, 2006 – June 30, 2007

DNR has provided several types of guidance from June 5, 2006 through June 30, 2007. Following is a description of the written guidance that has been shared with forest practices staff. Also see Chapter 15 - Training and Education, for a description of forest practices program's training efforts.

Summary of written guidance issued to department staff (June 5, 2006 – June 30, 2007).

Date	Reason for guidance	Accomplishment
issued		
9/26/06	Implementation of the Services	Ensure that each FPA indicating harvest adjacent
	Incidental Take Permit	to an Np water retain the tree count described in
	requirement #10	WAC 222-30-023(3). DNR provides
		documentation on the FPA approval if a
		determination has been made that the trees are
		not necessary for riparian function. (See guidance
		memo in the Small Forest Landowner Office
		chapter of this report).
12/22/06	Qualified expert report format	Ensure that clear and complete information is
		contained in all required Qualified Expert
		Reports.
3/5/07	Clarification of the method used	Provide a clear method to communicate with a
	by DNR for requiring additional	landowner and operator DNR's requirements that
	work as part of an FPA or	are documented on a Notice to Comply or Stop
	mitigation that results from	Work Order.
	previous actions.	
	Identify region specific issues	Each region office received a region specific list
	regarding FPA processing in the	of items that require attention for the processing
	six region audits.	of forest practices applications/notifications.
6/15/07	Reminder and update to	Clear communication and notification of
	facilitate USFWS and NOAA	Interdisciplinary Teams to the Services that
	Fisheries participation in	discuss aquatic resources.
	Interdisciplinary Teams	

4.3 Forest Practices Audits

The forest practices program has started a series of field audits. The purpose of the field audits is to evaluate delivery of the forest practices program at the region level to get a sense for how well the program is being implemented and to provide information to each Region management team. The Region management team can then support successful processes and make adjustments where needed to accomplish program goals. Additional information can be found in the included draft work plan for the audit and the results from the two completed regions (Northwest and Olympic).

The 2006/2007 region audits identified some common elements that need attention. They include:

- documenting pre-approval and post approval field visits,
- approving only complete applications,
- obtaining green up and perimeter information for all even-aged harvest activities

• adding only appropriate conditions. All regions received a review of DNR's conditioning authority along with WAC and RCW references.

In response to these findings, the program is implementing a master FPA documentation tracking system in each region to help with the documentation process. In addition, an action plan was created for specific regions to adjust their processes to obtain outcomes that better reflect program objectives. A review of the action plan will be completed.

The forest practices program and the Services have discussed the goal of increasing consistency of documentation for landowner-tribe meetings. The program is working to meet this goal in two ways: (1) updating guidance on implementing WAC 222-20-120 and (2) determining a tracking method to more consistently document that required meetings are held. Once implemented, the tracking method will allow improved annual reporting on the program's implementation of the landowner-tribe meeting requirement.